

201-15659



**U.S. Nitroglycerin Producers Consortium**

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October 19, 2004

Michael O. Leavitt, Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116

Attention: Chemical Right-to-Know Program;  
HPV Challenge Program;  
HPV Reference Number:

Dear Administrator Leavitt,

The U.S. Nitroglycerin Producers Consortium (USNPC), an affiliate of the Synthetic Organic Chemical Manufacturers Association (SOCMA), is pleased to update our U.S. HPV Challenge submission with robust summaries for the *Biodegradation* and *Genetic Toxicity: Chromosomal Aberration* studies on nitroglycerin (CAS # 55-63-0). These studies were conducted in response to the EPA comments and questions contained in a letter to the USNPC from Mr. Oscar Hernandez, Risk Assessment Division, dated February 20<sup>th</sup>, 2003.

The edited and enclosed final HPV document is comprised of a summary matrix of the required SIDS data points indicating the necessary test, test species, protocol used, and the results; and forty-three individual Robust Summaries. This document differs from the one submitted to the EPA on April 25, 2003, in that it incorporates the data from the *Biodegradation* and *Chromosomal Aberration* studies.

Due to the volatile nature of nitroglycerin, the USNPC not only provided the test sample for both studies but also traveled to the respective testing labs to ensure safe handling of the material. Per data available to the USNPC indicating the stability of nitroglycerin at ambient temperatures over 12 months, the test material was stored at ambient temperatures during both studies.

With the submission of the *Biodegradation* and *Genetic Toxicity: Chromosomal Aberration* studies on nitroglycerin, the USNPC's commitment to the U.S. EPA High Production Volume Challenge program is now complete.

Members of the USNPC are Alliant Techsystems, Inc., Copperhead Chemical Company, Inc., Dyno Nobel, Inc., and St. Marks Powder, Inc. Should any questions arise regarding the USNPC HPV submission or related issue, please contact Tucker Helmes, USNPC Executive Director at (202) 721-4154 or [helmes@socma.com](mailto:helmes@socma.com).

Sincerely,

C. Tucker Helmes, Ph.D.  
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Cc: USNPC Group Members